

1 WALTER F. BROWN (STATE BAR NO. 130248)  
2 wbrown@paulweiss.com  
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
3 535 Mission Street, 24th Floor  
San Francisco, CA 94105  
4 Telephone: (628) 432-5111

5 LIZA M. VELAZQUEZ (admitted *pro hac vice*)  
lvelazquez@paulweiss.com  
6 DAVID W. BROWN (admitted *pro hac vice*)  
dbrown@paulweiss.com  
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
8 1285 Avenue of the Americas  
New York, NY 10019-6064  
9 Telephone: (212) 373-3000

10 Attorneys for Defendant  
11 AMAZON.COM SERVICES, LLC

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA

15 MICHELLE RIZVANOVIC, individually  
and on behalf of other persons similarly  
16 situated,

17 Plaintiff,

18 v.

19 AMAZON.COM SERVICES, LLC, a  
Delaware limited liability corporation, and  
20 DOES 1 through 10, inclusive,

21 Defendants.

Case No.: 1:21-cv-01804-JLT-HBK

**JOINT STIPULATION REGARDING  
OPPOSITION AND REPLY BRIEF  
DEADLINES AND HEARING DATE  
FOR DEFENDANT AMAZON.COM  
SERVICES, LLC'S MOTION TO  
DISMISS OR, IN THE  
ALTERNATIVE, MOTION TO  
STRIKE**

Proposed Hearing Date: March 14, 2022

1           Defendant Amazon.com Services, LLC (“Amazon”) and Plaintiff Michelle Rizvanovic  
2 (together, the “Parties”), by and through their respective undersigned counsel, hereby stipulate  
3 and agree as follows:

4           Amazon will file its Motion to Dismiss the Class Action Complaint or, in the alternative,  
5 Motion to Strike the Class Allegations (the “Motion”) on January 26, 2022. The Parties have  
6 agreed that Plaintiff’s brief in opposition will be due by February 18, 2022. The Parties have  
7 further agreed that Amazon’s reply brief will be due by March 7, 2022.

8           The Parties hereby stipulate that the hearing date on Amazon’s Motion shall be March  
9 14, 2022, at 9:00 a.m. No other parties have appeared in this action or are affected by this  
10 stipulation.

11          The stipulation herein reached will not alter the date of any event or any deadline already  
12 fixed by Court order. This stipulation complies with the requirements of Local Rule 230.

13          A proposed Order seeking to modify the briefing schedule is submitted herewith, which  
14 the Parties jointly request that the Court enter.

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Respectfully submitted,

2  
3 Dated: January 26, 2022

4 By: /s/ Dean S. Ho (as authorized on 01/26/22)  
5 Dean S. Ho  
6 OPTIMUM EMPLOYMENT LAWYERS

7 Christian J. Petronelli  
8 PETRONELLI LAW GROUP, PC

9  
10  
11 Attorneys for Plaintiff  
12 MICHELLE RIZVANOVIC

13 Dated: January 26, 2022

14 By: /s/ Walter F. Brown  
15 Walter F. Brown  
16 Liza M. Velazquez  
17 David W. Brown  
18 PAUL, WEISS, RIFKIND, WHARTON  
19 & GARRISON LLP

20  
21 Attorneys for Defendant  
22 AMAZON.COM SERVICES, LLC

23  
24  
25  
26  
27  
28

1 WALTER F. BROWN (STATE BAR NO. 130248)  
2 wbrown@paulweiss.com  
3 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
4 535 Mission Street, 24th Floor  
5 San Francisco, CA 94105  
6 Telephone: (628) 432-5111

7 LIZA M. VELAZQUEZ (admitted *pro hac vice*)  
8 lvelazquez@paulweiss.com  
9 DAVID W. BROWN (admitted *pro hac vice*)  
10 dbrown@paulweiss.com  
11 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
12 1285 Avenue of the Americas  
13 New York, NY 10019-6064  
14 Telephone: (212) 373-3000

15 Attorneys for Defendant  
16 AMAZON.COM SERVICES, LLC

17 UNITED STATES DISTRICT COURT  
18 EASTERN DISTRICT OF CALIFORNIA

19 MICHELLE RIZVANOVIC, individually  
20 and on behalf of other persons similarly  
situated,

21 Plaintiff,

22 v.

23 AMAZON.COM SERVICES, LLC, a  
24 Delaware limited liability corporation, and  
25 DOES 1 through 10, inclusive,

26 Defendants.

27 Case No.: 1:21-cv-01804-JLT-HBK

28 **[PROPOSED] ORDER GRANTING  
JOINT MOTION TO MODIFY THE  
BRIEFING SCHEDULE**

## ORDER

Before the Court is a stipulation among the Parties. Having reviewed the Parties' stipulation, it is ordered as follows:

1. Pursuant to the undersigned's Standing Order (Doc. 14), the pending motion to dismiss or in the alternative strike (Doc. 15) will be submitted for decision on the papers without oral argument. No hearing will be calendared.
  2. Plaintiff shall file any brief in opposition on or before February 18, 2022.
  3. Amazon shall file any reply brief on or before March 7, 2022.
  4. The parties are further informed that as a result of the judicial resource emergency described in this Court's standing order re judicial emergency, more than 100 motions remain under submission in the caseload recently re-assigned to the undersigned.

IT IS SO ORDERED.

Dated: **January 27, 2022**

Jennifer L. Thurston  
UNITED STATES DISTRICT JUDGE